

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA  
(ERIE)**

IN RE:

Phillip L Blair and Rhonda S Blair  
Debtor(s).

CHAPTER 13

CASE NO.: 18-10438-GLT

**NOTICE OF ENTRY OF APPEARANCE  
AND DEMAND FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that NewRez LLC d/b/a Shellpoint Mortgage Servicing (“NewRez”), secured creditor to the above entitled Debtors by and through its undersigned counsel, hereby enters its appearance pursuant to Bankruptcy Rule 9010(b); and such counsel hereby requests, pursuant to Bankruptcy Rules 2002, 3007 and 9007 and Section 342 of the Bankruptcy Code, that copies of all notices and pleadings given or filed in the above-captioned case be given and served upon the undersigned at the following addresses and telephone/facsimile numbers:

Kaitlin D. Shire, Esquire  
Hill Wallack LLP  
1000 Floral Vale Blvd., Suite 300  
Yardley, PA 19067  
Telephone: (267) 794-6113  
Facsimile: (215) 579-9248  
Email: [kshire@hillwallack.com](mailto:kshire@hillwallack.com)

PLEASE TAKE FURTHER NOTICE that neither this Notice of Entry of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive NewRez’s (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case,

controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs, or recoupments to which NewRez is or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: September 7, 2023

Hill Wallack LLP

By: /s/ Kaitlin D. Shire

Kaitlin D. Shire, Esq.  
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Counsel to NewRez LLC d/b/a Shellpoint Mortgage  
Servicing

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**CERTIFICATE OF SERVICE**

I hereby certify that service was made upon all interested parties, indicated below of (i) Notice of Appearance of NewRez LLC d/b/a Shellpoint Mortgage Servicing in the manner indicated below on September 7, 2023:

Phillip L Blair  
518 Bessemer Avenue  
Grove City, PA 16127

Rhonda S Blair  
518 Bessemer Avenue  
Grove City, PA 16127  
**Debtors**  
**Via Regular Mail**

Daniel P. Foster  
Foster Law Offices  
1210 Park Avenue  
Meadville, PA 16335  
**Counsel for Debtor**  
**Via ECF**

Office of the U.S. Trustee  
Liberty Center.  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222  
**United States Trustee**  
**Via ECF**

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219  
**Chapter 13 Trustee**  
**Via ECF**

*By: /s/ Kaitlin D. Shire*  
Kaitlin D. Shire, Esq.,  
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